

### REMARKS

In the specification, the title and the first paragraph have been amended to better reflect the claim category.

Claims 1-5 were pending in this application prior to this amendment. Claims 1 and 5 were rejected in the Office Action dated 07 January 2003 (the "Office Action"). Applicants have added new claims 6-8 in order to more particularly and completely claim the present invention. No new matter has been introduced.

Claims 1 and 5 were rejected by the Examiner under 35 USC 102(b) as being anticipated by Dawson et al (US 5,465,792).

It is stated that Dawson discloses a method of inhibiting water production while allowing hydrocarbon production by letting water react with an emulsion causing cross-linking which forms a chemical stabilized structure.

The Applicants' understanding of Dawson et al is that the cross-linking of particles (monomers) takes place during the preparation of the "super-absorbing" particles. The preparation method used by Dawson et al. is the invert emulsion process and most of the description of Dawson et al (from column 2, line 54 to column 6, line 16) is dedicated to this preparation process. Only the following section beginning with column 6, line 17 to column 7, line 50 provides a description of the formation treatment. And in this section, cross-linking is referred to as one of properties of the particles that determine their ability to swell and/or their surface stickance and not as a reaction among the particles to stabilize the structure they formed under downhole conditions. In other words, Dawson et al suggest to use particles with different internal structures and hence properties for different formations. What Dawson et al, however, fails to suggest is a cross-linking of the particles inside the well. The formation treatment according to Dawson et al is limited to the swelling of particles in contact with water. The blockage of water producing formation happens as the particles swell inside small pore channels and fractures. Chemical Cross-linking in Dawson et al is only

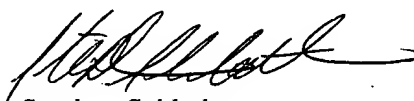
encountered at a stage where the particles are manufactured, i.e., inside a lab or chemical factory.

Therefore, the Applicants conclude that Dawson et al does not teach to stabilize a structure in portions of the formation by a cross-linking reaction.

Also Dawson et al fails to teach a second element of claim 1, namely the formation of a physically stabilized structure, e.g., a gel, among the particles of the composition. Consequently, Dawson et al fails to teach a third element of claim 1, as there is not teaching of the breaking of the physically stabilized structure by reversing the flow.

In light of the above amendments and remarks, applicant believes that the present application and claims 1 - 8 are in proper condition for allowance. Such allowance is earnestly requested. If the Examiner is contemplating any action other than allowance of all pending claims, the Examiner is urged to contact Applicant's representative, Mr. William Wang, in the United Kingdom at 011-44-1223-325268. It is believed that no fee is due this response, however, in the event a fee is necessary, the Commissioner is authorized to charge Deposit Account No. 19-0615(57.0286) in the amount of any applicable fee.

Respectfully submitted,



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